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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
 STEELMAN, individually; PAUL STEELMAN,
 as trustee of the Steelman Asset Protection Trust;
 MARYANN STEELMAN, as trustee of the
 Steelman Asset Protection Trust; JIM MAIN, as
 trustee of the Steelman Asset Protection Trust;
 STEPHEN STEELMAN; SUZANNE
 STEELMAN-TAYLOR; PAUL STEELMAN as
 trustee of the Paul C. Steelman and Maryann T.
 Steelman Revocable Living Trust; MARYANN
 STEELMAN, as trustee of the Paul C. Steelman
 and Maryann T. Steelman Revocable Living Trust;
 PAUL STEELMAN, as the trustee of the Paul
 Steelman Gaming Asset Protection Trust;
 KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
 SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
 B; CHRISTIANA, LLC; CHRISTIANA, LLC,
 SERIES A-Z; COMPETITION INTERACTIVE,
 LLC; PAUL STEELMAN, LTD.; STEELMAN
 PARTNERS, LLP; PAUL STEELMAN DESIGN
 GROUP, INC.; SPT HOLDINGS, LLC, SERIES
 B; AARON SQUIRES; and MATTHEW
 MAHANEY,

Defendants.

**JOINT STIPULATION EXTENDING
 DEADLINE FOR RESPONSE TO
 MOTION TO DISMISS**

(Second Request)

[ECF No. 177]





Plaintiff Ernest Bock, L.L.C. (“Bock”) and Defendants Aaron Squires and Matthew Mahaney (collectively, the “Moving Defendants”)¹, by and through their respective undersigned counsel, hereby submit this Joint Stipulation (the “Stipulation”) to extend the deadline for Bock to file and serve a response to the Moving Defendants’ Motion to Dismiss Aaron Squires and Matthew Mahaney Under Fed.R.Civ.P. 12(b)(6), which was filed with the Court on July 23, 2021. [Motion to Dismiss, ECF No. 171]. This Joint Stipulation is revised pursuant to the Court’s Order regarding the First Request. [ECF No. 176].

Pursuant to LR 7-2(b), the deadline for Bock to file and serve a response to the Motion to Dismiss is fourteen (14) days after service of the motion, which in this case is August 6, 2021.

Bock has initiated this request and obtained the Moving Defendants’ agreement to submit this Joint Stipulation because: (i) Moving Defendants’ were provided an additional period of approximately two weeks to prepare their initial submission [see ECF No. 167; ECF No. 149; ECF No. 148]; (ii) that initial submission took the form of twenty-five page, dispositive motion raising at least four complex issues of law requiring considerable research [see ECF No. 171]; (iii) the response will need to consider and analyze the application of the relevant law to the fifty-five-page Counts XX and XXI of Bock’s Fourth Amended Complaint [See ECF No. 171, at p. 138-193]; (iv) it will take significant time to handle the appropriate redaction of Bock’s response consistent with the redactions in the Fourth Amended Complaint [see Id.]; and (v) Bock’s numerous counsel have had to meet several other significant motion and briefing deadlines in the week-and-one-half after July 23, 2021, creating a significant challenge in adequately responding to this critical motion.

Bock and the Moving Defendants hereby stipulate to extend the deadlines to file any response to the Motion to Dismiss and any subsequent reply in support of the motion as follows:

1. Bock shall file any opposition to the Motion to Dismiss on or before **August 16, 2021**.
2. Moving Defendants shall file any reply by **August 23, 2021**.

DATED: August 4, 2021.

DATED: August 4, 2021.

**WEINBERG, WHEELER, HUDGINS, SOLOMON DWIGGINS FREER &
GUNN & DIAL, LLC STEADMAN, LTD.**



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Order

Good cause appearing, plaintiff Ernest Bock, LLC's and defendants Aaron Squires and Matthew Mahaney's stipulation to extend deadlines **[ECF No. 177] is GRANTED**. Bock's time to file its response to defendants' dismissal motion is extended to **August 16, 2021**. Squires and Mahaney's time to file any reply in support of their dismissal motion is extended to August 23, 2021.

U.S. District Judge Jennifer A. Dorsey
Dated: August 4, 2021.